



**ADDENDUM: REPORT ON THE STATUS OF CASES CURRENTLY PENDING AGAINST THE  
BOLIVARIAN REPUBLIC OF VENEZUELA**

1. ***Comparelli v. Bolivarian Republic of Venezuela, No. 14-cv-24414 (S.D. Fla.):*** This is a case arising out of the Republic's alleged expropriation of a petrochemical company. The case is stayed indefinitely by order of the court. The court has ordered the Republic to file a status report on September 6, 2019.
2. ***Conocophillips Petrozuata B.V. v. Bolivarian Republic of Venezuela, No. 1:19-cv-00683 (D.D.C.):*** This is an action to confirm an ICSID arbitral award issued against the Republic for allegedly expropriating Plaintiffs' interests in three Venezuelan oil projects. A summons was electronically issued on March 12, 2019. There has been no return of service.
3. ***Crystallex International Corp. v. Bolivarian Republic of Venezuela, Nos. 18-02797, 18-03124 (3d Cir.):*** This is a collection action on a judgment entered on an arbitration award arising out of the alleged expropriation of mining interests. The district court ordered attachment and sale of shares of the indirect parent company of Citgo Petroleum Corporation sufficient to pay a \$1.2 billion judgment. The Third Circuit stayed proceedings in the District Court pending appeal. Following the recognition of Interim President Guaidó, the Republic intervened in the appeal and requested a 120-day stay of proceedings in the circuit court. The circuit heard oral argument on the merits on April 15, 2019. The merits are submitted and awaiting decision. The district court proceedings remain stayed.
4. ***Helmerich & Payne International Drilling Co. v. Bolivarian Republic of Venezuela, No. 11-cv-1735 (D.D.C.):*** This is an action by an American oil-drilling company and its subsidiary arising out of the Republic's alleged expropriation of the company's oil rigs. The case is stayed. The court has ordered the Plaintiff to file a status report on August 14, 2019.
5. ***Koch Minerals Sarl v. Bolivarian Republic of Venezuela, No. 17-cv-2559 (D.D.C.):*** This is an action to confirm an ICSID arbitral award issued against the Republic arising out of the Republic's alleged expropriation of a fertilizer company. The clerk of court filed an entry of default against the Republic on May 14, 2019, and the Plaintiff filed a motion for default judgment on May 16, 2019. A hearing on the motion is currently set for August 6, 2019. The Republic has not appeared in that case.
6. ***Lovati v. Bolivarian Republic of Venezuela, No. 1:19-cv-04796 (S.D.N.Y.):*** This is an action arising out of the Republic's alleged failure to make contractually mandated interest payments on bonds held by four natural persons residing in Italy. Plaintiffs informed the court on June 11, 2019 that they have not effected service on the Republic.



- 7. *OI European Grp. B.V. v. Bolivarian Republic of Venezuela*, No. 16-cv-1533 (D.D.C.):** This is an action to confirm an ICSID arbitral award issued against the Republic arising out of the Republic's alleged expropriation of the Plaintiff's investment projects in Venezuela. The court granted the Plaintiff's motion for summary judgment on May 21, 2019, and entered judgment for the Plaintiff.
- 8. *OI European Grp. B.V. v. Bolivarian Republic of Venezuela, PDVSA*, No. 19-cv-00290 (D. Del.):** This is an action to confirm an ICSID arbitral award issued against the Republic, combined with an action against alleged alter egos, arising out of the Republic's alleged expropriation of the Plaintiff's investments in two container glass factories. Three of the Defendants moved to stay pending the Third Circuit's decision in *Crystalex*. On June 27, 2019, the parties filed a stipulation to adjourn defendants' date to answer until the Court decides the motion to stay.
- 9. *Rusoro Mining Ltd. v. Bolivarian Republic of Venezuela*, No. 4:18-cv-01458 (S.D. Tex.):** This is an action alleging that the Republic allegedly misappropriated funds from CITGO Petroleum, a U.S.-based petroleum refiner and retailer. Plaintiff filed a status report on October 1, 2018 indicating that it has not effected service on the Republic.
- 10. *Rusoro Mining Ltd. v. Bolivarian Republic of Venezuela*, No. 18-07044 (D.C. Cir.):** This is an action to confirm an ICSID arbitral award arising out of the Republic's alleged expropriation of a gold mine. After the District Court confirmed the award, a French court annulled most of the award. The Plaintiff has appealed the annulment in France, and the Court of Appeals for the D.C. Circuit has held the case in abeyance pending completion of the French set-aside proceedings.
- 11. *Saint-Gobain Performance Plastics Europe v. Bolivarian Republic of Venezuela and Petróleos de Venezuela, S.A.*, No. 1:18-cv-01963-LPS (D. Del.):** This is an action to confirm an ICSID arbitral award issued against the Republic arising out of the alleged expropriation of the Plaintiff's interest in NorPro Venezuela, C.A., a manufacturer of ceramic proppants used in hydraulic fracking. The clerk of court filed an entry of default against the Republic on June 12, 2019, and the Plaintiff filed a motion for default judgment on June 24, 2019. The Republic has not appeared in that case.
- 12. *Tenaris S.A. v. Bolivarian Republic Of Venezuela*, Nos. 18-cv-1371, 18-cv-1373 (D.D.C.):** This is an action to confirm an ICSID arbitral award issued against the Republic arising out of the Republic's alleged expropriation of the Plaintiffs' interests in an iron production company. On April 1, 2019, the clerk of court mailed a summons to the U.S. Department of State. No return of service has been made.



- 13. *Valores Mundiales, S.L. v. Bolivarian Republic of Venezuela*, No. 1:19-cv-00046-KBJ (D.D.C.):** This is an action to confirm an ICSID arbitral award issued against the Republic arising out of measures allegedly undertaken by the Republic to harm the Plaintiffs' investments in Venezuelan wheat and corn flour producers. The Plaintiffs have not effected service on the Republic.
- 14. *Vestey Group Ltd. v. Bolivarian Republic of Venezuela*, No. 18-cv-01456 (D.D.C.):** This is an action to confirm an ICSID arbitral award issued against the Republic arising out of the alleged expropriation of the Plaintiff's cattle ranching business. The Plaintiff has not effected service on the Republic.